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10 Attorneys for Defendant  
NIANTIC, INC.

11  
12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA  
14 SAN FRANCISCO DIVISION

15  
16 NANTWORKS, LLC,  
NANT HOLDINGS IP, LLC,

17 v.  
18 *Plaintiffs,*

19  
20 NANTIC, INC.,

21 *Defendant.*

22 Case No. 3:20-CV-06262-LB

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**DECLARATION OF MATTHEW J. BRIGHAM  
IN SUPPORT OF MOTION TO EXCLUDE  
TESTIMONY OF PLAINTIFFS' DAMAGES  
EXPERT ALAN GOEDDE**

DATE: May 30, 2024  
TIME: 9:30 a.m.

Courtroom B – 15th Floor  
450 Golden Gate Ave.  
San Francisco, CA 94102

1 I, Matthew J. Brigham, declare as follows:

2 1. I am an attorney at the law firm of Cooley LLP and am counsel for Defendant  
3 Niantic, Inc. (“Niantic”) in the above-captioned case. I provide this declaration upon personal  
4 knowledge and, if called upon as a witness, would testify competently as to the matters recited  
5 herein.

6 2. Attached as **Exhibit A** is a true and correct copy of the Expert Report of Alan G.  
7 Goedde, Ph.D., dated December 21, 2023, which was marked “CONFIDENTIAL – ATTORNEY’S  
8 EYES ONLY” and is being filed under seal.

9 3. Attached as **Exhibit B** is a true and correct copy of excerpts from the deposition  
10 transcript of Alan Goedde, dated March 12, 2024, which was marked “Highly Confidential –  
11 Attorneys’ Eyes Only” and is being filed under seal.

12 4. Attached as **Exhibit C** is a true and correct copy of the Rebuttal Expert Report  
13 Regarding Damages of Julia Rowe, dated February 2, 2024, which was marked “HIGHLY  
14 CONFIDENTIAL – ATTORNEYS’ EYES ONLY” and is being filed under seal.

15 5. Attached as **Exhibit D** is a true and correct copy of excerpts from the deposition  
16 transcript of Matthew Turk, Ph.D., dated March 20, 2024, which was marked “HIGHLY  
17 CONFIDENTIAL” and is being filed under seal.

18 I declare under penalty of perjury under the laws of the United States of America that the  
19 foregoing is true and correct.

20 Executed on April 18, 2024, in Palo Alto, California.

22 */s/ Matthew J. Brigham* \_\_\_\_\_  
23 Matthew J. Brigham  
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